GE Aircraft Engines

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U.S. Department of Transportation,
Docket No. FAA-2004-17168,
400 Seventh Street, SW.,
Nassif Building
Room PL-401,
Washington, DC 20590-001

Subject: Review of Existing Regulations

References: 14 CFR Part 33

Gentlemen,

GE Aircraft Engines has reviewed FAA Docket No. FAA-2004-17168. This notice invites the public to suggest to the FAA, which regulations now in effect we believe should be amended, eliminated, or simplified. GE suggests that the following sections of 14 CFR Part 33 be reviewed.

Section 33.97 Thrust Reversers

This section would benefit from a revision to address the difference between fan (cold structure) and core (hot structure) reversers. Also the endurance test and hence the calibration test are almost never performed with the reverser(s) installed. More often than not, simulated service cycles have satisfied the 33.97(a) requirement.

Section 33.88 Engine Overtemperature Test

This requirement was originally a 5 minute uncooled rotor integrity demonstration (reference AC33-3). As implemented by Amendment 6, it became a 30 minute test which was found to be overly severe because of flowpath limitations. Amendment 10 changed the duration back to 5 minutes but also changed the focus from a rotor integrity demonstration to an overall hot section durability demonstration. There is little evidence that cooled rotors are significantly influenced by a 75 degrees F increase in gas path temperature, making this requirement superfluous from a safety standpoint. Further there is no direct JAR-E or CS-E corollary. JAR-E 700 and CS-E 700, Excess Operating Conditions, is the closest related requirement and it only comes into play if the conditions of speed and temperature can arise.

Section 33.87 Endurance Test

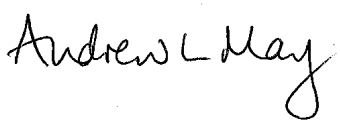
This section should be revised to allow the use of other test cycles based upon submittal of acceptable data. The rationale is that the cycle was defined at a time when engine architecture and control systems were of a much simpler nature and may not provide the best test for a specific change or application. This can represent an undue burden on the applicant.

Section 33.17 Fire prevention

This section of 14 CFR Part 33 does not take account of fire protection zones as used at the aircraft level for engine certification. This rule should be revised to allow for the actual installations, with these installation assumptions documented in the Installation Manual required by 14 CFR Part 33 section 33.5.

We would like to thank the FAA for the opportunity to comment on FAA regulations.

Sincerely,



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